

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	G15-32M
	§	
DENNIS P.M. HUGHES	§	

**HUGHES' UNOPPOSED MOTION
TO CONTINUE ALL SETTINGS**

Dennis P.M. Hughes, through Neal Davis, files this unopposed motion to continue all dates of all settings to March 2016, due to outstanding discovery, showing specifically:

1. Hughes is charged with several counts involving child pornography. This is a case involving the Internet, computers, hard drives and other digital storage devices, and digitally stored data. The government has been conducting discovery on these devices.

2. The defense received the first round of discovery from the government in July 2015, and the government has been very cooperative in responding to discovery requests. However, given the nature of the case—with various locations of storage devices (from Hughes' house to M.D. Anderson) and various law enforcement agencies involved—the government is still examining these devices. Therefore, a forensic report of any of these images or devices has not yet been completed. Undersigned has yet to review any of this.

3. The defense may also conduct additional discovery of the computer and storage devices involved.

4. Hence, more time is needed for the defense to do its due diligence and render effective assistance of counsel.

4. The prosecution is not opposed to a continuance.

5. The defense and prosecution suggest new pre-trial settings and trial settings in the first half of March 2016.

Hughes therefore prays that all dates of all settings be continued.

Respectfully submitted,

NEAL DAVIS LAW FIRM, PLLC

/s/

Neal Davis

State Bar No. 24001117

Federal No. 23729

917 Franklin, 6th Floor

Houston, Texas 77002

Telephone: (713) 227-4444

Facsimile: (800) 769-7140

Email: Neal@NealDavisLaw.com

Defendant's lawyer

CERTIFICATE OF CONFERENCE

I certify I have emailed Assistant United States Attorney Sherri Zack about Hughes' Motion to Continue on October 28, 2015, and she is UNOPPOSED.

/s/

Neal Davis

CERTIFICATE OF SERVICE

I certify that copy of Hughes' Motion to Continue has been sent to Assistant United States Attorney Sherri Zack on October 28, 2015, via ECF/PACER.

/s/

Neal Davis

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ORDER

Whereas, Hughes and his attorney have filed a motion requesting a continuance setting forth the grounds for continuance in the attached motion, the Court finds that the ends of justice would be served to the best interest of the public and the defendant, pursuant to Title 18, United States Code, Section 3161(h)(8), et seq, by the granting on the motion for continuance of sentencing, and the period of delay resulting from granting this continuance shall be excludable under the Speedy Trial Act at 18 U.S.C. 3161.

The motion for continuance is granted and the new dates are as follows:

1. Pretrial Conference: March____, 2016.

2. Jury selection and trial: March _____, 2016.

Signed this ____ day of _____, 2015.

UNITED STATES DISTRICT JUDGE